

REMARKS

Reconsideration and allowance of the subject application are respectfully solicited.

Claims 1 through 21 are pending, with Claims 1, 11, and 21 being independent.

Claims 11 through 20 were withdrawn from consideration. Claims 1, 4, 6, 10, 12, and 21 have been amended.

Claims 1 through 10 and 21 were rejected under 35 U.S.C. § 103 over US 6,014,195 (Sakamoto, et al.) in view of US 2001/0004296 A1 (Van Aerle, et al.) and Official Notice. All rejections are respectfully traversed.

Claims 1 and 21 recite, *inter alia*, applying to the first sub-pixel... in a range within which a brightness of light... is variable *and* in a range in which a chromatic color... changes within red and blue, and applying to the second sub-pixel... in a range within which a brightness of light... is variable, the second sub-pixel having a green color filter.

However, Applicants respectfully submit that none of Sakamoto, et al., Van Aerle, et al., and Official Notice, even in the proposed combination, assuming, *arguendo*, that such could be combined, discloses or suggests at least the above-discussed claimed features as recited, *inter alia*, in Claims 1 and 21.

Applicants respectfully submit that Sakamoto, et al. discloses, e.g., converting image data to color data and gradation (i.e., tone) data, applying a voltage corresponding to the color data for one or more pixels and applying a voltage corresponding to the gradation data to other pixels (e.g., col. 4, line 66 through col. 5, line 8), which corresponds to displaying color in one pixel (i.e., displaying each color as ECB color) and displaying brightness monochromatically in another pixel (i.e., displaying intermediate tones of the color with the aid of pixel(s) for monochromatic intermediate brightness).

The Official Action acknowledges there is no green color filter in Sakamoto, et al., and thus relies upon Van Aerle, et al.'s filter, which reliance is respectfully traversed by Applicants. Applicants submit that if, for sake of argument, a green filter could be combined with Sakamoto, et al.'s display device by applying a green filter to a part of pixels, then when displaying 50% red, the pixels without color filter would display ECB color of red so that the 50% intermediate tone is displayed in the green color filter pixel, but that this composition, however, would give a mixed color of red and dark green but would not give a correct dark red since the monochrome display of the pixel for carrying out the displaying of intermediate color is essential for Sakamoto, et al. Accordingly, Applicants respectfully submit that even if the documents could be combined as proposed, the combination would fail to disclose or suggest at least the above-discussed claimed features as recited, *inter alia*, in Claims 1 and 21.

Applicants further respectfully submit that there has been no showing of any indication of motivation in the cited documents that would lead one having ordinary skill in the art to arrive at the above-discussed claimed features. By means of such features, for example, Applicants submit that the present invention may, for example, display colors of red, blue, and intermediate colors thereof as ECB color, with intermediate brightnesses of green being displayed by the other sub-pixel; of course, the claims are not limited to the foregoing.

The dependent claims are also submitted to be patentable because they set forth additional aspects of the present invention and are dependent from independent claims discussed above. Therefore, separate and individual consideration of each dependent claim is respectfully requested.

REQUEST FOR ENTRY OF AMENDMENT

This Amendment After Final Rejection is an earnest attempt to advance prosecution and reduce the number of issues, and is believed to clearly place this application in condition for allowance. Furthermore, Applicants respectfully submit that a full appreciation of these amendments will not require undue time or effort given the Examiner's familiarity with this application. Moreover, this Amendment was not earlier presented because Applicants earnestly believed that the prior Amendment placed the subject application in condition for allowance. Accordingly, entry of this Amendment under 37 C.F.R. § 1.116 is respectfully requested.

CONCLUSION

Applicants submit that this application is in condition for allowance, and a Notice of Allowance is respectfully requested.

Applicants' undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

/Daniel S. Glueck/
Daniel S. Glueck
Attorney for Applicants
Registration No. 37,838

FITZPATRICK, CELLA, HARPER & SCINTO
30 Rockefeller Plaza
New York, New York 10112-3800
Facsimile: (212) 218-2200
DSG\rmn